

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

MONIQUE DA SILVA MOORE,
MARYELLEN O'DONOHUE,
LAURIE MAYERS, HEATHER
PIERCE, and KATHERINE
WILKINSON on behalf of themselves
and all others similarly situated,

PLAINTIFFS,

v.

PUBLICIS GROUPE SA and
MSLGROUP,

DEFENDANTS.

Civ No. 11-CV-1279 (ALC) (AJP)

PLAINTIFFS' NOTICE OF MOTION FOR LEAVE TO FILE
SECOND AMENDED COMPLAINT

Pursuant to Rule 15 of the Federal Rules of Civil Procedure, Plaintiffs and Class Representatives Monique da Silva Moore, MaryEllen O'Donohue, Laurie Mayers, Heather Pierce, and Katherine Wilkinson, by and through undersigned counsel, respectfully submit this Motion for Leave to File Second Amended Complaint, concurrently and in conjunction with the filing of Plaintiffs' Motion for Conditional Certification of a Collective Action. This motion is based upon the memorandum in support filed herewith and the applicable law.

DATED: February 29, 2012

SANFORD WITTELS & HEISLER, LLP



Janette Wipper Esq.

Steven L. Wittels, Esq.

Siham Nurhussein, Esq.

Deepika Bains, Esq.

Attorneys for the Plaintiffs and the Class

CERTIFICATE OF SERVICE

I, Deepika Bains, hereby certify under penalty of perjury that on this 29th day of February 2012 true and correct copies of the foregoing Notice of Motion for Leave to Amend were served on all counsel of record by hand delivery and overnight mail.

/s/ Deepika Bains

Deepika Bains